1 2 3 4 5 6 7 8	MILES EHRLICH (Bar No. 237954) miles@ramsey-ehrlich.com ISMAIL RAMSEY (Bar No. 189820) izzy@ramsey-ehrlich.com AMY CRAIG (Bar No. 269339) amy@ramsey-ehrlich.com RAMSEY & EHRLICH LLP 803 Hearst Avenue Berkeley, CA 94710 (510) 548-3600 (Tel) (510) 291-3060 (Fax) Attorneys for Non-Party Anthony Levandowski		
9	UNITED STATES DISTRICT COURT		
10	NORTHERN DISTRICT OF CALIFORNIA		
11	SAN FRANCISCO DIVISION		
12	WAYMO LLC,	Case No.: 3:17-cv-00939 WHA	
13	Plaintiff,	CORRECTED DECLARATION OF MILES EHRLICH IN SUPPORT OF	
14	V.	PLAINTIFF WAYMO'S ADMINISTRATIVE MOTION TO FILE	
15	UBER TECHNOLOGIES, INC., et al.,	UNDER SEAL ITS OPPOSITION TO DEFENDANTS UBER	
16 17	Defendants.	TECHNOLOGIES, INC. AND OTTOMOTTO, LLC'S MOTION TO	
18	\	EXCLUDE ONE OF THREE OPINIONS PROFFERED BY WAYMO EXPERT JIM TIMMINS (Dkt. 1773)	
19		JIM TIMMING (DRG 1773)	
20	I, Miles Ehrlich, declare as follows: 1. I am an attorney licensed to practice in the State of California and am admitted practice before this Court. I am a partner at the law firm Ramsey & Ehrlich LLP, counsel for Non-Party Anthony Levandowski. I have personal knowledge of the matters set forth in this		
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25	Declaration, and if called as a witness I would testify competently to those matters.		
26	2. I make this declaration in support of Waymo's Administrative Motion to File		
27	Under Seal Its Opposition To Defendants Uber Technologies, Inc. And Ottomotto, LLC's		
28	Motion To Exclude One Of Three Opinions Proffered By Waymo Expert Jim Timmins (Dkt.		
	EHRLICH DECLARATION ISO WAYMO'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL		
	Case No. 3:17-00939-WHA		

1773) ("The Administrative Motion"). The Administrative Motion seeks an order sealing the following documents based on Mr. Levandowski's designation of privilege and/or confidentiality:

Document	Portion to Be Filed Under Seal	Designating Party
Waymo's Opposition To Defendants Uber Technologies, Inc. And Ottomotto, LLC's Motion To Exclude One Of Three Opinions Proffered By Waymo Expert Jim Timmins ("Waymo's Brief")	Highlighted Portions	Anthony Levandowski (yellow highlights)
Exhibit 4 to Waymo's Brief	Entire Document	Anthony Levandowski
Exhibit 9 to Waymo's Brief	Highlighted Portions	Anthony Levandowski (yellow highlighted portions)

- 3. The yellow-highlighted portions of Waymo's Brief reflect confidential information regarding Mr. Levandowski's estate planning for his family, including his minor children, through the creation of a trust of which they are the beneficiaries, as well as other personal financial information. Mr. Levandowski requests that his confidentiality and privacy interests in this personal estate and financial information be respected in this proceeding.
- 4. Exhibit 4 is the document through which Mr. Levandowski created a trust for the benefit of his minor children. Because this document reflects sensitive, personal, estate planning, and financial information, Mr. Levandowski requests that the confidentiality and privacy of this document be maintained.
- 5. Exhibit 9 is an excerpt of the deposition of Mr. Levandowski, the yellow highlighted portions of which reflect the same confidential estate planning and personal financial information discussed in paragraphs 3 and 4 above. Mr. Levandowski therefore requests that this information remain confidential.
 - 6. Waymo's request to seal is narrowly tailored to those portions of Waymo's

Opposition To Defendants Uber Technologies, Inc. And Ottomotto, LLC's Motion To Exclude One Of Three Opinions Proffered By Waymo Expert Jim Timmins that merit sealing. I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed in Berkeley, California, on September 26, 2017. Date: September 26, 2017 Respectfully submitted, /s/ Miles Ehrlich Miles Ehrlich Ramsey & Ehrlich LLP Counsel for Non-Party Anthony Levandowski